



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 20 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL # 7009 1680 0000 7677 9166
RETURN RECEIPT REQUESTED

Mr. Dean Gadoury
EHS Team Leader
BASF Catalyst, LLC
120 Pine Street
Post Office Box 4017
Elyria, Ohio 44036-2017

Re: Notice of Violation
Compliance Evaluation Inspection
US EPA ID No.: OHD 004 203 519

Dear Mr. Gadoury:

On August 13 – 14, 2013 representatives of the U.S. Environmental Protection Agency conducted a multi-media inspection of the BASF Catalyst, LLC facility at 120 Pine Street, Elyria, Ohio (BASF). The purpose of the inspection was to evaluate BASF's compliance with various environmental regulations. As a large quantity generator of hazardous waste, BASF is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). This letter relates to BASF's compliance with certain provisions of RCRA; specifically, those regulations related to the generation, treatment and storage of hazardous waste.

Based on information provided by BASF; EPA's review of records pertaining to BASF; and the inspector's observations, EPA has determined that BASF has unlawfully stored hazardous waste without a permit or interim status as a result of BASF's failure to comply with certain conditions for a permit exemption under Ohio Admin. Code §§ 3745-52-34(A)-(C). Paragraphs 1- 3, below, discuss the permit exemption conditions with which BASF was out of compliance at the time of the inspection.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 1-3 are also independent TSD

requirements incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256. Accordingly, each failure of BASF to comply with these conditions is also a violation of the corresponding requirement in Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ohio Admin. Code chs. 3745-54 to 57 and 3745-205 [40 C.F.R. Part 264] (if the facility should have been permitted).

Finally, EPA has determined that BASF violated RCRA requirements related to hazardous waste determinations and manifests as described in paragraph 4, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

The permit exemption conditions identified below in paragraphs 1 – 3 are also independent TSD requirements violated by BASF:

1. Contingency Plan

Under Ohio Admin. Code §§ 3745-52-34(A) and 3745-65-54(C) and (E) [40 C.F.R. §§ 262.34(a) and 265.54(c) and (e)], a large quantity generator's contingency plan must be reviewed, and immediately amended, whenever the facility or list of emergency equipment changes.

At the time of the inspection, page 1 of BASF's August 1, 2013 Contingency Plan indicated that materials are delivered to BASF via rail. However, facility personnel indicated during the inspection that this is no longer done. Page 10 of the Contingency Plan, states that BASF does not store ignitable hazardous waste. However, the inspectors observed a satellite accumulation container in Building C-7 for empty aerosol cans which was labeled as ignitable hazardous waste. Table G-2 on page 21 of the Contingency Plan does not list the emergency equipment (shovels and brooms) in the waste water treatment plant.

2. Hazardous Waste Training

Under Ohio Admin. Code §§ 3745-52-34(A) and 3745-65-16(C) [40 C.F.R. §§ 262.34(a) and 265.16(c)], facility personnel must take part in an annual review of the initial training required under Ohio Admin. Code § 3745-65-16(A) [40 CFR 265.16(a)].

At the time of the inspection, employee Tim Anglin, who was designated in the August 1, 2013 Contingency Plan as an emergency coordinator, was not on the list of employees who received RCRA review training in 2012 and 2013.

3. Inspection Logs

Under Ohio Admin. Code §§ 3745-52-34(A)(1)(a) and 3745-66-74 [40 C.F.R. §§ 262.34(a) and 265.74], a large quantity generator must inspect areas where containers are stored, and record inspections in an inspection log or summary.

At the time of the inspection, the inspection logs for the hazardous waste storage area in Building 2 did not indicate that they were logs for that particular storage area. Additionally, some of the questions on the logs' checklist were not answered.

By failing to comply with the conditions for a permit exemption, above, BASF became an operator of a hazardous waste storage facility, and was required to obtain an Ohio hazardous waste storage permit. BASF failed to apply for such a permit. BASF's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ohio Admin. Code §§ 3745-50-45(A); 3745-50-41(A) and (D) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ohio Admin. Code chs. 3745-65 to 68 and 3745-256 is also an independent violation of the corresponding TSD requirement.

OTHER VIOLATIONS

4. Hazardous Waste Determinations and Manifests

Under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11], a person who generates a solid waste must determine if that waste is a hazardous waste. Under Ohio Admin. Code §§ 3745-52-20 [40 CFR § 262.20], a person who transports a hazardous waste off-site must prepare a Manifest according to the instructions in the appendix of that part.

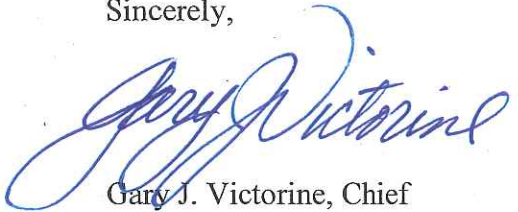
At the time of the inspection, BASF had not completed a determination of whether the chromium and copper waste water treatment sludge exhibited the hazardous waste characteristic for silver. An addendum to the chromium and copper waste water treatment sludge profile added in 2012 indicated that the total concentration of silver in the waste was 180 milligrams/kilogram. The results of a Toxic Characteristic Leaching Procedure test done on the waste in November of 2012 indicated a non-detect concentration (less than 0.05 milligrams/liter) of silver.

Manifest number 009770135 JJK for a shipment of Chrome Copper Sludge to EnviroSAFE Services of Ohio on January 31, 2013, included the characteristic hazardous waste number D011 for silver. Manifest numbers 010307602 JJK dated January 30, 2013, 010308914 JJK dated May 9, 2013, and 010335375 JJK dated July 11, 2013, for shipments of Chrome Copper Sludge to EnviroSAFE of Ohio do not include the characteristic hazardous waste number D011 for silver.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection date of August 14, 2013 to establish compliance with the above conditions and requirements. You should submit your response to Michael Cunningham, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Michael Cunningham, of my staff, at (312) 886-4464 or at cunningham.michael@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: teri.finfrock@epa.state.oh.us

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD RCS2, LR-8J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604**

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: BASF Catalyst, LLC

EPA ID No.: OHD 004 203 519

**ADDRESS: 120 Pine Street
Elyria, Ohio 44035**

DATE OF INSPECTION: August 13 -14, 2013

EPA INSPECTOR: Michael Cunningham

STATE INSPECTOR: Shannon Ryan

PREPARED BY: Michael Cunningham

APPROVED BY: _____

DATE: _____

Purpose of Inspection

This inspection was part of an EPA Multi-Media Compliance Evaluation Inspection of BASF Catalyst, LLC (BASF) located at 120 Pine Street in Elyria, Ohio. The hazardous waste portion of the inspection was an evaluation of BASF's compliance with the hazardous waste regulations found at 3745-52 of the Ohio Administrative Code and 40 Code of Federal Regulations Parts 262 through 279.

Participants

Federal Hazardous Waste Inspector: Michael Cunningham, Environmental Scientist, U.S. EPA
State Hazardous Waste Inspector: Shannon Ryan, Ohio EPA, Northeast District Office
Representatives of BASF:

David W. Sheaves, M.S., Environmental Team Leader

Dean Gadoury, EHS Team Leader

Sandra L. Kowaleski, Site Director, Process Catalysts & Technologies

Michael J. Murphy, PhD, Site EHS Services

Matthew A. Comi, EHS Specialist

Introduction

The hazardous waste portion of the multi-media inspection took place on August 13 and 14, 2013. The hazardous waste inspectors presented their inspector credentials and described the purpose of the hazardous waste portion of the inspection. All of the BASF representatives provided verbal descriptions of the site and accompanied us on a tour. They also provided the records we requested for review.

Site Description

BASF manufactures base metal catalysts. Raw materials include a variety of chemicals including alumina, copper, chromium and nickel oxides, specialty powders (zeolites) silica-aluminum powders, and chromic acid. BASF has operated at the present location since 1898, and currently has approximately 185 employees. BASF added a new battery manufacturing building in 2012 for the production of Lithium Ion cathode batteries. As of the inspection date, BASF has conducting only small scale battery manufacturing operations.

Raw materials are brought in by rail or truck and stored in either the tank farm on the southeast portion of the site or in the warehouse. The catalyst manufacturing processes take place in multiple buildings throughout the site. Processing includes a combination of mixing, reacting, forming, drying, granulating, sizing, and extrusion activities. Materials are dried in kilns and may also be calcined in one of seven calciners.

Emissions from the various manufacturing processes are controlled by air pollution control equipment that collects the material and deposits it into 55-gallon drums. BASF uses orange-colored drums for the collection of emission control deposits so that they can be easily distinguished from other types of drums. The emission control material is managed as hazardous waste (D005, D006, D007, D008).

Off-specification product is either re-processed or sent off-site as hazardous waste (D005, D006, D007, D008). Waste water from the manufacturing processes is sent to an on-site waste water treatment system. Two of the systems treat waste water from the copper-chromium processes, while a third is used for PH adjustment and solids control of the rest of the plant waste water. The two filter presses associated with the copper-chromium process waste water treatment system generate hazardous waste water treatment sludge (D005, D006, D007, D008).

The hazardous waste water treatment sludge is sent to Envirosafe Services of Ohio in Oregon, Ohio, or Envirite of Ohio in Canton, Ohio. The waste water treatment sludge from the filter press associated with the PH and solids treatment process is managed as non-hazardous waste.

The on-site laboratory is used for product quality control purposes. The analytical work done for making hazardous waste determinations is provided by the treatment and disposal facilities that accept the waste. Used oil is generated from the waste water treatment process and the maintenance of process equipment.

August 13, 2013 Site Tour

The inspectors began the tour in the waste water treatment area, and then continued in Building 31. The building has three extrusion lines, an extruder dryer, a calciner, and two impregnating lines. We then walked over to the Reduction Towers where hydrogen gas is used to strip water from product pellets. The stripped water is sent to the waste water treatment system. A skimmer is used to remove oil. The skimmed oil is managed in two oil skimmer tanks located in Building C-7. The tanks were marked with the words "Used Oil." There was also a satellite accumulation container in Building C-7 for empty aerosol cans (D001 – ignitable) and an orange 55-gallon drum attached to a mixer used to make alumina tablets that was marked "Hazardous Waste Dust Collector."

We then went to the new Lithium Ion Battery Building (Building 90). The production process starts out on the fourth floor with the raw materials being moved through the plant in boxes made of a refractory material, called saggers. The saggers are cleaned out after handling the product. The clean-out material is reused in the process. I observed an orange 55-gallon satellite accumulation drum for contaminated Tyvek suits in the sagger clean-up area.

We then went to Building 26 where two rotary calciners are used in the production of copper-chromium products. We went to Building 10 where product tablets are mixed and compressed to make a paste. We went to Building 25 where I observed two dust collectors with orange 55-gallon drums marked "Hazardous Waste."

We then toured Building 2 where the hazardous waste containers are stored. I observed a row of yellow roll-off buggies containing waste from the 583 calciner department, Aluminum Gel process in Building 16, and Building 584 lab area. I also observed super sacs of dry general loose powder waste and sweepings from process equipment clean-out from Buildings 31 and 588. All of the containers were marked with the words "Hazardous Waste", numbers D005, D006, D007, D008, and accumulation start dates. I also observed used bulbs in cardboard containers and used ballasts and batteries in 55-gallon drums. The containers were marked with universal waste labels and accumulation start dates. I also observed 55-gallon drums of used aerosol cans and waste zirconium oxide from Building 509. There were also super sacs containing used filters from the dust control collection systems from various production areas and a tote of used oil.

Outside of the building I observed a roll-off box with a hazardous waste label with numbers D005, D006, D007, D008 that is used for contaminated pieces of equipment and large contaminated filters. I also observed the portable Emergency Spill Station located next to the roll-off box.

August 14, 2013 Site Tour

The inspectors began the tour in the waste water treatment plant laboratory. Tests for metals and pH of the waste water are run in the lab. Waste waters generated in the lab are put back into the waste water treatment system. We then went back to Building 2. I observed several pieces of process equipment along the north and east walls of the building, including a blender, tank, filter press, and dust control unit. The equipment did not appear to be in use.

We then went to the maintenance shop in Buildings 29 and 6. The shop had a parts washer that uses a water-based cleaner. I observed an orange 55-gallon satellite accumulation drum for used emission control filters, and a 30 gallon satellite accumulation drum for used aerosol cans. The drums were marked with a hazardous waste label.

We then went to the Quality Control laboratory where product testing takes place. All waste samples go into a satellite accumulation drum marked with a hazardous waste label. Waste acids may go to the waste water treatment system.

Record Review

The inspectors reviewed the following documents:

- Waste profiles for the waste water treatment sludges, contaminated pieces of equipment, air pollution control solids, and contaminated filters.
An addendum to the chromium and copper waste water treatment sludge profile added in 2012 indicated that the total concentration of silver in the waste was 180 milligrams/kilogram. The results of a Toxic Characteristic leaching Procedure test done on the waste in November of 2012 indicated a non-detect concentration (less than 0.05 milligrams/liter) of silver.
- Hazardous waste manifests and land disposal restriction forms from 2012 and 2013.
Manifest number 009770135 JJK for a shipment of Chrome Copper Sludge to Envirosafe Services of Ohio on January 31, 2013, included the characteristic hazardous waste number D011 for silver.
Manifest numbers 010307602 JJK dated January 30, 2013, 010308914 JJK dated May 9, 2013, and 010335375 JJK dated July 11, 2013, for shipments of Chrome Copper Sludge to Enviroline of Ohio do not include the characteristic hazardous waste number D011 for silver.
- Weekly Inspection Logs for the hazardous waste storage area in Building 2.
The inspection logs did not indicate where the hazardous waste storage areas were located. Some of the questions on the checklist were not always answered.
- Training Records.
The employee Mr. Tim Anglin, who is designated in the Contingency Plan as an emergency coordinator, was not on the list of employees who received RCRA training in 2012 and 2013.

- Contingency Plan dated August 1, 2013.
On page 1 of the Plan indicates that materials are delivered to the plant via rail. However, facility personnel indicated during the inspection that this is no longer done.
On page 10 of the Plan, it states that the facility does not store ignitable hazardous waste. However, the inspectors observed a satellite accumulation container in Building C-7 for empty aerosol cans which was labeled as ignitable hazardous waste.
Table G-2 on page 21 of the Plan does not list the emergency equipment (shovels and brooms) in the waste water treatment plant.

Closing Conference

I summarized my review of the site and told the facility personnel that EPA would provide the follow-up response and report.

Attachment

- Large Quantity Generator Checklist



Photograph 1 of 4. Universal waste containers in Building 2. PJN, 08/13/13, 1137 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 2 of 4. Typical drums for waste aerosol cans. PJN, 08/13/13, 1139 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 3 of 4. View looking west into Building 2. PJN, 08/13/13, 1150 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



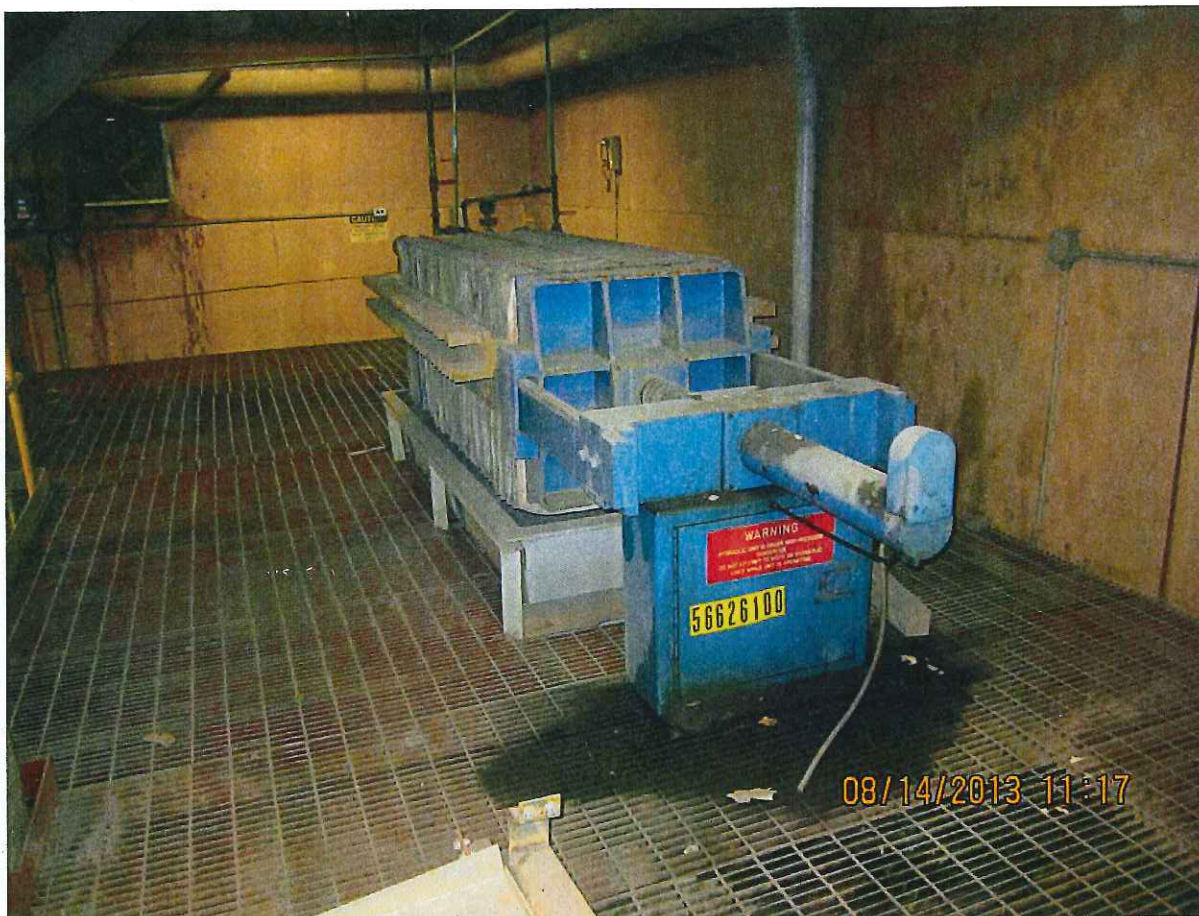
Photograph 4 of 4. Roll-off box for hazardous waste, located immediately south of Building 2. PJN, 08/13/13, 1139 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 1 of 5. Blender along north wall of Building 2. PJN, 08/14/13, 1110 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 2 of 5. Tank and filter press (on deck above) along east wall of Building 2. PJN, 08/14/13, 1111 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 3 of 5. Plate and frame filter press on deck along east wall of Building 2. PJN, 08/14/13, 1117 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 4 of 5. Dust control unit on deck (just south of plate and frame filter press above) on deck along east wall of Building 2. PJN, 08/14/13, 1117 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.



Photograph 5 of 5. Hood on deck along north wall of Building 2, used fill blender in photograph 1. PJN, 08/14/13, 1119 hrs., Cannon PowerShot SD 1400IS, Ser. No., 212065043412, digital media.

**LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY**

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: $\text{Amount in gallons} \times \text{Specific Gravity} \times 8.345 = \text{Amounts in pounds}$.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
4.	Were annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
5.	Are annual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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[ID number]

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
MANIFEST REQUIREMENTS		
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]		
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]		
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.		
17.	If the generator received a rejected load or residue and accumulated the waste on-site, did the generator sign item 18c or 20 of the manifest? [3745-52-34(M)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.		
PERSONNEL TRAINING		
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]		
23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
25.	Does the generator provide annual refresher training to employees? [3745-65-16(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

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26.	Does the generator keep records and documentation of:		
a.	Job titles? [3745-65-16(D)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
29.	Does the plan describe the following:	
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or 40 CFR Part 1510, or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

[Facility Name/Inspection Date]

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new TP area
fail type of waste

EMERGENCY PROCEDURES		
33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.		
PREPAREDNESS AND PREVENTION		
34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:	
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Verify that the equipment is listed in the contingency plan.		
36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg., phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
SATELLITE ACCUMULATION AREA REQUIREMENTS		
43.	Does the generator ensure that satellite accumulation area(s):	
a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:	
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
b.	In good condition? [3745-66-71]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected weekly? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>

NOTE: "Week" means 7 consecutive days per ORC§1.44(A).

49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.

53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]

PRE-TRANSPORT REQUIREMENTS

54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

TID: 10309

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OHD004203519	2. Page 1 of 1	3. Emergency Response Phone CHEMTREC 800-424-9300	4. Manifest Tracking Number 009770135 JJK		
5. Generator's Name and Mailing Address BASF CORPORATION 120 PINE STREET ELYRIA, OH 44035							
Generator's Site Address (if different than mailing address)							
Generator's Phone: 814-870-3023 ATTN: RIK MIRTH							
6. Transporter 1 Company Name ENVIROSERVE, I.V.						U.S. EPA ID Number OHD987050564	
7. Transporter 2 Company Name						U.S. EPA ID Number	
8. Designated Facility Name and Site Address ENVIROSAFE SERVICES OF OHIO, INC. 876 OTTER CREEK ROAD OREGON, OH 43616						U.S. EPA ID Number OHD045243706	
Facility's Phone: 419-698-3500							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
X	1. RQ NA3077, HAZARDOUS WASTE, SOLID, N.O.S. (D005, D006, D007, D008, D011) 9. PG III			1		CM	25 Y
	2.						
	3.						
	4.						
13. Waste Codes D005 D006 D007 D008 D011							
14. Special Handling Instructions and Additional Information 1.) CHROME COPPER SLUDGE (33420) ERG#171 WTS ORDER # 48060 Box # 3003 17460							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offoror's Printed/Typed Name Lance Nersisyan				Signature [Signature]		Month Day Year 01/31/13	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: SCFF Olson Signature: [Signature] Month Day Year: 01/31/13 Transporter 2 Printed/Typed Name: Signature: Month Day Year:							
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) U.S. EPA ID Number: Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year:							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H132 2. 3. 4.							
20. Designated Facility Owner or Operator, Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name: Bob Sobelki Signature: [Signature] Month Day Year: 01/31/13							

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0031

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number OHD 004 203 519	2. Page 1 of 1	3. Emergency Response Phone (800) 832-4357	4. Manifest Tracking Number 010335375 JJK
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Generator's Name and Mailing Address
120 PINE STREET

Generator's Site Address (if different than mailing address)

ELYRIA, OH 44035

Generator's Phone: (440) 329-2567

received
7.22.13 n Wolf

6. Transporter 1 Company Name

Envirite of Ohio, Inc.

U.S. EPA ID Number

OHD 980 568 992

7. Transporter 2 Company Name

U.S. EPA ID Number

8. Designated Facility Name and Site Address
ENVIRITE OF OHIO, INC.

2050 CENTRAL AVENUE, S.E.
CANTON, OH 44707

U.S. EPA ID Number

OHD 980 568 992

Facility's Phone: (330) 617-4300

GENERATOR

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			D005	D006	D007
X	1. RQ, NA3077, Hazardous waste, solid, n.o.s. (Cadmium & Chromium), 9, PGIII D008, ERG #171	1	CM	20	Y	D008		
	2.							
	3.							
	4.							

4. Special Handling Instructions and Additional Information

14840 / CHROME COPPER SLUDGE / Please contact the generator if not deliverable.

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offor's Printed/Typed Name

Signature

Month Day Year

Lance Neuschaefer

[Signature]

07 11 13

16. International Shipments

☐ Import to U.S.

☐ Export from U.S.

Port of entry/exit:

Date leaving U.S.:

Transporter signature (for exports only):

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name

Signature

Month Day Year

JEFF MUNTZAN

[Signature]

07 11 13

Transporter 2 Printed/Typed Name

Signature

Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space

☐ Quantity

☐ Type

☐ Residue

☐ Partial Rejection

☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)

U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)

Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

H110

2.

3.

4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name

Signature

Month Day Year

RUOLIE SANDERS

[Signature]

07 11 13

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

BASF HELP

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OHD 004 203 519	2. Page 1 of 1	3. Emergency Response Phone (800) 832-4357	4. Manifest Tracking Number 010308914 JJK		
5. Generator's Name and Mailing Address BASF CORPORATION 120 PINE STREET ELYRIA, OH 44035					Generator's Site Address (if different than mailing address)		
Generator's Phone: (440) 329-2567					U.S. EPA ID Number OHD 980 568 992		
6. Transporter 1 Company Name Envirite of Ohio, Inc.					U.S. EPA ID Number		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address ENVIRITE OF OHIO, INC. 2050 CENTRAL AVENUE, S.E. CANTON, OH 44707					U.S. EPA ID Number OHD 980 568 992		
Facility's Phone: (330) 617-4300							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes	
X	1. RC, NA3077, Hazardous waste, solid, n.o.s. (Cadmium & Chromium), 9, PGIII, D008, ERG #171	1	CM	15	Y	D005	D008
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1. 148407 CHROME COPPER SLUDGE / Please contact the generator if not deliverable. Box # 5B1335							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name ROBERT WARTHA					Signature <i>[Signature]</i>		
					Month Day Year 05 09 13		
16. International Shipments <input type="checkbox"/> Import to U.S. <input checked="" type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name DANIEL B. KUNKLE					Signature <i>[Signature]</i>		
					Month Day Year 05 09 13		
Transporter 2 Printed/Typed Name					Signature		
					Month Day Year		
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator)					U.S. EPA ID Number		
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator)					Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H110		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name THOMAS COULTE					Signature <i>[Signature]</i>		
					Month Day Year 05 09 13		

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number OHD 004 203 519		2. Page 1 of 1		3. Emergency Response Phone (800) 832-4357		4. Manifest Tracking Number 010307602 JJK			
		5. Generator's Name and Mailing Address BASF CORPORATION 120 PINE STREET ELYRIA, OH 44035						Generator's Site Address (if different than mailing address)			
Generator's Phone: (440) 329-2567		6. Transporter 1 Company Name Envirite of Ohio, Inc.						U.S. EPA ID Number OHD 980 568 992			
7. Transporter 2 Company Name								U.S. EPA ID Number			
8. Designated Facility Name and Site Address ENVIRITE OF OHIO, INC. 2050 CENTRAL AVENUE, S.E. CANTON, OH 44707		Facility's Phone: (330) 617-4300						U.S. EPA ID Number OHD 980 568 992			
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))				10. Containers		11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes	
	X	1. RC, NA3077, Hazardous waste, solid, n.o.s. (Cadmium & Chromium), U, PSH 0003, ERG #171				No.	Type				
		2.									
		3.									
		4.									
14. Special Handling Instructions and Additional Information 1. 14240 / CHROME COPPER SLUDGE / Please contact the generator if not deliverable.											
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable International and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.											
Generator's/Offor's Printed/Typed Name Lance Neuschaefer											
Signature <i>[Signature]</i>											
Month Day Year 01 / 30 / 13											
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____ Transporter signature (for exports only): _____										
	17. Transporter Acknowledgment of Receipt of Materials										
	Transporter 1 Printed/Typed Name not info										
Signature <i>[Signature]</i>											
Month Day Year 01 / 30 / 13											
Transporter 2 Printed/Typed Name											
Signature											
Month Day Year											
DESIGNATED FACILITY	18. Discrepancy										
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection										
	Manifest Reference Number:										
	18b. Alternate Facility (or Generator) U.S. EPA ID Number										
Facility's Phone:											
18c. Signature of Alternate Facility (or Generator)											
Month Day Year											
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)											
1. H111 2. 3. 4.											
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a											
Printed/Typed Name											
Signature											
Month Day Year											
013218											

